

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Edward Stewart

Plaintiff,

vs.

David Feldman, *et al.*

Defendants.

Civil Action
No. 20-776

STIPULATION

1. Plaintiff's counsel shall maintain any accounting records, financial records, contracts with third parties, communications with investors, and/or tax records that Defendants produce at their law offices or on electronic-practice-management software to which Plaintiff Edward Stewart himself does not have access.

2. Plaintiff Edward Stewart himself may review the documents listed in Paragraph 1 only at the offices of Gamburg & Benedetto. He may not maintain separate copies of any documents produced under this Stipulation.¹

3. Plaintiff's counsel may provide any document whatsoever to any retained expert so long as the expert agrees not to further disseminate the document.

4. This Stipulation does not restrict the filing of any document as part of a court filing. However, Plaintiff's counsel shall confer with Defendants' counsel prior to filing any of the documents enumerated in Paragraph 1, to determine whether any documents to be filed shall be done so under Seal of Court. In the event the parties cannot agree, Plaintiff shall permit Defendants to submit an appropriate filing with the Court, in a prompt fashion, for this Court's determination as to whether such document(s) shall be filed under Seal.

¹ Mr. Stewart has already received electronic copies of the document production so far, under his agreement not to disclose it to third parties. This Stipulation does not prevent him from keeping a copy of these documents. However, Mr. Stewart reaffirms that he will not disclose the production so far to third parties and that he will not file the tax returns and financial documents that he was already provided without following the procedure outlined in Paragraph 4 of this Stipulation.

Stipulated and agreed to:

/s/ Daniel J. Auerbach

Daniel J. Auerbach (Pa. I.D. No. 316856)
Gamburg & Benedetto, LLC
1500 John F. Kennedy Blvd., Suite 1203
Philadelphia, PA 19102

/s/ Simon Rosen

Simon Rosen (Pa. I.D. No. 38603)
Law Office of Simon Rosen, PLLC
128 Greenwood Avenue, 2nd Floor
Wyncote PA 19095

APPROVED BY THE COURT:

On August 7, 2020,

/s/ John M. Gallagher

GALLAGHER, J.